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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

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14  
15 SHARON L. WATSON,

16 Plaintiff,

17 v.

18 LOS ANGELES COUNTY  
19 DEPARTMENT OF MENTAL  
20 HEALTH, JONATHAN SHERIN (in  
21 his individual capacity),

22 Defendants.

Case No. 2:19-cv-4149

COMPLAINT FOR  
DISCRIMINATION IN VIOLATION  
OF TITLE I OF THE AMERICANS  
WITH DISABILITIES ACT, 42  
U.S.C. §§ 12111-12117; SECTION 504  
OF THE REHABILITATION ACT  
OF 1973, 29 U.S.C. § 794; AND THE  
CALIFORNIA FAIR EMPLOYMENT  
AND HOUSING ACT, CAL. GOV'T  
CODE § 12940(a)

23  
24 DEMAND FOR JURY TRIAL  
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1 **INTRODUCTION**

- 2 1. Sharon Watson, a blind Licensed Clinical Social Worker (LCSW), brings this  
3 action against her employer, the Los Angeles County Department of Mental  
4 Health (“LAC-DMH” or “the County”), and its Director of Mental Health,  
5 because they force her to use an electronic and information technology system,  
6 the Integrated Behavioral Health Information System (“IBHIS”) that is not  
7 accessible to her as a person who relies on screen reader assistive technology, and  
8 refuses to provide a qualified reader to assist her.
- 9 2. Through their use of discriminatory electronic and information technology and  
10 refusal to engage in good faith in an interactive process to reasonably  
11 accommodate Ms. Watson’s blindness, with the result that she is not effectively  
12 accommodated, Defendants violate Ms. Watson’s rights under Title I of the  
13 Americans with Disabilities Act, 42 U.S.C. § 12111-12117 (“ADA”), Section 504  
14 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 (“Section 504”), and the  
15 California Fair Employment and Housing Act, Cal. Gov’t Code § 12940(a)  
16 (“FEHA”).

17 **JURISDICTION**

- 18 3. This is primarily an action for declaratory and injunctive relief and damages  
19 pursuant to the ADA and Section 504. This Court therefore has subject matter  
20 jurisdiction over this action pursuant to 28 U.S.C. § 1331.
- 21 4. Pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over  
22 Plaintiff’s pendent state claims for injunctive relief and damages under FEHA.

23 **VENUE**

- 24 5. Pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(c), venue is proper in the District  
25 in which this Complaint is filed because Defendant’s discriminatory conduct  
26 occurred within this District and continues to occur within this District.

27 **PARTIES**

- 28 6. Plaintiff Sharon Watson, LCSW, was born blind in one eye as a result of

1 retinopathy of prematurity and became fully blind in both eyes at age twenty. Her  
2 medical condition substantially limits her major life activity of seeing. Ms. Watson  
3 works for the County as a Psychiatric Social Worker II, providing therapy and  
4 other services for the County's mental health consumers at the East San Gabriel  
5 Valley Mental Health Center in Covina, California. Ms. Watson resides in  
6 Claremont, California.

- 7 7. Defendant Los Angeles County Department of Mental Health ("LAC-DMH"),  
8 with a budget of approximately \$2.4 billion, is the largest county-operated mental  
9 health department in the United States, directly operating programs in more than  
10 85 sites, with headquarters at 550 South Vermont Avenue, Los Angeles,  
11 California 90020. It is a local government agency that receives both state and  
12 federal financial assistance. It is also an employer. More than 4,000 employees,  
13 including Ms. Watson, work for LAC-DMH.
- 14 8. Jonathan Sherin, MD, Ph.D was appointed by the Los Angeles County Board of  
15 Supervisors as the County's Director of Mental Health effective November 1,  
16 2016. In this role, he leads LAC-DMH.

#### 17 ADMINISTRATIVE PROCEDURES

- 18 9. In September of 2018 and again in December of 2018, Plaintiff filed a charge  
19 with the United States Equal Employment Opportunity Commission ("EEOC"),  
20 cross-filed with the California Department of Fair Employment and Housing  
21 ("DFEH"), alleging LAC-DMH's ongoing failure to make reasonable  
22 accommodation or provide effective communication and denying Ms. Watson,  
23 because of her disability, employment opportunities for which she is qualified to  
24 perform the essential duties.
- 25 10. On January 15, 2019, Ms. Watson received a letter indicating that the County  
26 Board of Supervisors' County Equity Oversight Panel had received a County  
27 Policy of Equity Complaint filed on Ms. Watson's behalf. By telephone on  
28 January 18, 2019, Ms. Watson explained to a staff member of the County Intake

1 Specialist Unit, who is the initial point of contact for the County Equity Oversight  
2 Panel, the inaccessibility of IBHIS, LAC-DMH's refusal to provide a qualified  
3 reader, and the harm it was causing her. To date Ms. Watson has received no  
4 further contact from the County Equity Oversight Panel.

5 11. In December of 2018, the DFEH provided a state Right to Sue notice to Plaintiff.

6 12. On January 3, 2019, Plaintiff filed a California Tort Claims Act notice with the  
7 County and cooperated with the subsequent investigation. On February 17, 2019,  
8 the County rejected Ms. Watson's claim by operation of law.

9 13. On April 29, 2019, upon request of Plaintiff, the EEOC provided a federal  
10 Notice of Right to Sue.

11 **FACTUAL ALLEGATIONS**

12 14. Ms. Watson accepted a position at LAC-DMH in 2004, after obtaining a  
13 graduate degree in social work at the University of Wisconsin, Madison. She  
14 passed the California state boards in her field to become a Licensed Clinical  
15 Social Worker in 2009. Ms. Watson was blind when she completed her graduate  
16 degree, accepted a position with the County, and passed the state boards in her  
17 field.

18 15. Ms. Watson has provided therapy and other services for the County's mental  
19 health consumers for the past fourteen years. In her current position, she works  
20 for LAC-DMH at the East San Gabriel Valley Mental Health Center in Covina,  
21 California.

22 16. Defendant employs licensed clinical social workers to provide behavioral health  
23 services for Los Angeles County residents. The work includes administrative  
24 tasks related to the coordination and documentation of provided services.

25 Through the first ten years of her employment with LAC-DMH, Ms. Watson  
26 independently completed these aspects of her employment using screen reader  
27 technology in conjunction with accessible software programs and generally  
28 available human assistance (e.g., file clerks), and the occasional use of qualified

1 readers.

2 17. In 2014, the County launched the Integrated Behavioral Health Information  
3 System (“IBHIS”), a clinical, administrative, and financial electronic and  
4 information technology system, to coordinate behavioral health services.

5 18. In developing, procuring, maintaining, or using electronic or information  
6 technology, the County, as a recipient of California state financial assistance, is  
7 required by California state law to comply with the accessibility requirements of  
8 Section 508 of the federal Rehabilitation Act of 1973 and regulations  
9 implementing that act. Cal. Gov’t Code § 7405(a); *see also* Cal. Gov’t Code §  
10 11135(b) (applying California’s stronger state prohibitions and protections to  
11 entities covered by Section 11135). The Section 508 requirements, developed by  
12 the United States Access Board, were published in the Federal Register on  
13 December 21, 2000. *See* 36 C.F.R. §§ 1194.1 and 1194, Appendices A, C, and  
14 D. As of 2019, IBHIS still does not comply with Section 508 requirements.

15 19. Disabled employees such as Ms. Watson, who rely on screen reader technology,  
16 cannot use IBHIS independently because it does not comply with existing  
17 accessibility standards.

18 20. Tasks that require use of IBHIS comprise a significant portion of each work day  
19 for Ms. Watson.

20 21. Because she is blind and is prevented from using her screen reader technology  
21 with IBHIS, Ms. Watson must rely on human assistance for every aspect of using  
22 IBHIS, from reading and interpreting its screens and forms and cues, to reading  
23 and writing substantive clinical information within those forms. Since the launch  
24 of IBHIS in 2014, Ms. Watson can no longer independently schedule, plan, and  
25 document services; access and communicate clinical information; review other  
26 clinicians’ work; or make requests for time off or overtime, among other tasks  
27 that require employees to use IBHIS.

28 22. Beginning in 2014, Ms. Watson has sought to work with the County to make

1 IBHIS accessible through a technological fix, without avail.

2 23. In the absence of a technological fix, Ms. Watson has focused on addressing the  
3 barriers IBHIS poses by requesting a qualified reader: a person able to read  
4 effectively, accurately, and impartially using any necessary specialized vocabulary,  
5 available throughout the day without delay because his or her sole or prioritized  
6 task is to act as an aide to Ms. Watson.

7 24. A reader working with Ms. Watson must communicate a wide range of  
8 information involving the specialized vocabulary of Ms. Watson's work. The  
9 reader must understand the IBHIS interface and its relationship to Ms. Watson's  
10 tasks. When Ms. Watson requests a section of IBHIS from which to obtain  
11 information and the information to obtain, the reader must interpret this request,  
12 and translate responsive information to speech, including metatextual  
13 information like page layout. The reader must speak, requesting any necessary  
14 additional instructions, while at the same time listening to receive the next set of  
15 instructions, and interpreting any such instructions. Ms. Watson must listen for  
16 comprehension and simultaneously consider how to articulate additional  
17 instructions.

18 25. An established rapport between Ms. Watson and a qualified reader helps Ms.  
19 Watson control for individuality in description and gradually train a reader to  
20 intuit her need for certain details or sequences of information. A trained,  
21 practiced, and qualified reader increases her productivity by allowing completion  
22 of tasks with minimal communication and cognitive overhead, permitting  
23 automaticity, confidence, and efficiency unavailable through temporary, rotating  
24 assistance.

25 26. Ms. Watson has requested and explained to Defendants her need for the  
26 accommodation of a qualified reader on numerous occasions, including to her  
27 direct supervisors, orally and in writing, and to Defendant Sherin in a letter dated  
28 September 28, 2018.

1 27. Defendants have denied Ms. Watson her requested accommodation. Instead,  
2 they force Ms. Watson to rely upon the alternative of a changing roster of  
3 temporarily assigned employees with competing responsibilities, available if at all  
4 only after a request has been made.

5 28. Few to none of the readers that the County assigns to Ms. Watson have had  
6 experience completing the tasks on IBHIS that are part of Ms. Watson's  
7 necessary use of the program. Many lacked reading and computer literacy skills,  
8 struggling to read and transcribe the necessary, specialized vocabulary of a  
9 Licensed Clinical Social Worker. All have been assigned for at most a matter of  
10 months, preventing Ms. Watson from benefiting from any proficiency they  
11 develop through assisting her. The inadequate qualifications and temporary  
12 nature of the readers the County provides add tremendous inefficiency and  
13 cognitive load to Ms. Watson's use of IBHIS.

14 29. The County continues to make a reader/scribe available to Ms. Watson only  
15 upon her daily, repeated requests. All such aides are unavailable part of the day,  
16 every day, forcing Ms. Watson to wait, unable to complete tasks, until assistance  
17 becomes available. The County's refusal to assign someone the sole or prioritized  
18 task to act as an aide to Ms. Watson forces her to spend significant time simply  
19 waiting for a reader to arrive.

20 30. The County's discrimination has injured Ms. Watson's employment  
21 opportunities. In June and July 2018, and again in January 2019, Ms. Watson  
22 faced discriminatory accusations related to her performance and productivity.  
23 Ms. Watson continues to face the threat of poor productivity reviews and related  
24 low performance evaluations because she must spend portions of each day  
25 simply waiting for the County to assign assistance in response to her requests for  
26 a reader to help her with tasks that require use of IBHIS, and because the  
27 assistance the County assigns is not effective. The inadequate qualifications and  
28 temporary nature of the readers the County provides add tremendous

1 inefficiency and cognitive load to Ms. Watson’s use of IBHIS.  
2 31. Ms. Watson has further faced a discriminatory work environment in that,  
3 because the software is inaccessible to her, she has lost the benefits and privileges  
4 to her employment that IBHIS confers, such as improved clinical outcomes,  
5 improved ability to schedule, and generally improved productivity.  
6 32. Ms. Watson is and will continue to be significantly harmed by Defendants’  
7 refusal to provide her a qualified reader to assist her in using IBHIS or to  
8 remediate the inaccessible software.

9 **FIRST CAUSE OF ACTION**

10 **Title I of the ADA**

11 33. Ms. Watson re-alleges and incorporates herein all previously alleged paragraphs  
12 of the complaint.  
13 34. Defendants are employers within the meaning of 42 U.S.C. § 12111(5)(A).  
14 35. Ms. Watson, with or without reasonable accommodation, can perform the  
15 essential functions of the employment position she holds with LAC-DMH, and is  
16 thus an employee and a qualified individual within the meaning of 42 U.S.C. §  
17 12111(8).  
18 36. Employers are prohibited from discriminating against a qualified individual on  
19 the basis of disability in regard to the terms, conditions, and privileges of  
20 employment. 42 U.S.C. § 12112(a).  
21 37. Discrimination under the ADA includes an employer’s not making reasonable  
22 accommodations to the known physical or mental limitations of an otherwise  
23 qualified employee, unless the employer can demonstrate the accommodation  
24 would impose an undue hardship on the operation of its business. 42 U.S.C. §  
25 12112(b)(5)(A). Employers may not deny employment opportunities to an  
26 employee who is an otherwise qualified individual with a disability, if such denial  
27 is based on the need of such covered entity to make reasonable accommodation  
28 to the physical or mental impairments of the employee or applicant. 42 U.S.C. §



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12112(b)(5)(B).

38. The term reasonable accommodation includes “[m]odifications or adjustments that enable a covered entity’s employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by its other similarly situated employees without disabilities.” 29 C.F.R. § 1630.2(o)(1)(iii).

39. Reasonable accommodations may include, *inter alia*, making existing facilities used by employees readily accessible to and usable by individuals with disabilities, acquisition or modification of equipment or devices, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities. 42 U.S.C. § 12111(9). Defendants have failed to make the electronic and information technology aspects of LAC-DMH’s facilities readily accessible to and usable by Ms. Watson as an employee with a disability.

40. Defendants’ use of IBHIS further violates the ADA as a method of administration that has the effect of discriminating against and perpetuating discrimination against blind employees through its disparate impact on them. 42 U.S.C. §12112(b)(3). Defendants’ use of an inaccessible design within IBHIS, although facially neutral, in fact falls more harshly on blind employees and cannot be justified by business necessity. *See Raytheon Co. v. Hernandez*, 540 U.S. 44 (2003) (defining disparate impact claims under Title I).

41. Once an employee requests an accommodation, the employer must engage in an interactive process with the employee to determine the appropriate reasonable accommodation. The interactive process requires (1) direct communication between the employer and employee to explore in good faith the possible accommodations, (2) consideration of the employee’s requests, and (3) offering an accommodation that is reasonable and effective. *Zivkovic v. S. Cal. Edison Co.*, 302 F.3d 1080, 1089 (9th Cir. 2002).

42. Ms. Watson has requested a qualified reader as an accommodation and auxiliary aide for effective communication. “Qualified reader means a person who is able

1 to read effectively, accurately, and impartially using any necessary specialized  
2 vocabulary.” 28 C.F.R. § 35.104.

3 43. The readers that Defendants have provided to Ms. Watson are not qualified  
4 readers, as they have lacked the basic qualifications and job descriptions  
5 necessary to accommodate Ms. Watson and provide her effective  
6 communication.

7 44. Defendants have violated the ADA in that they have not explored in good faith  
8 the possible accommodations to address the inaccessibility of IBHIS, not  
9 considered Ms. Watson’s requests for a qualified reader, and not offered  
10 alternatives that are reasonable or effective.

11 45. The interactive process is an ongoing obligation. Defendants are aware or should  
12 be aware that its alternative assistance to Ms. Watson is failing. Defendants are  
13 therefore under a continuing duty to engage with Ms. Watson’s request for a  
14 qualified reader. They have not done so and continue not to do so.

15 46. Defendants’ conduct constitutes an ongoing and continuous violation of the ADA  
16 and its supporting regulations. Unless restrained from doing so, Defendants will  
17 continue to violate the ADA. Unless enjoined, Defendants’ conduct will continue  
18 to inflict injuries for which Plaintiff has no adequate remedy at law.

19 47. Defendants have engaged in intentional discrimination in that they have failed to  
20 demonstrate good-faith efforts, in consultation with Ms. Watson, who has  
21 informed them that accommodation is needed, to identify and make a reasonable  
22 accommodation that would provide her with an equally effective opportunity and  
23 would not cause an undue hardship on the operation of business, and  
24 Defendants have engaged in a discriminatory practice or practices with malice or  
25 with reckless indifference to her federally protected rights. 42 U.S.C. §§  
26 1981a(a)(3) and (b). Ms. Watson is therefore entitled to compensatory and  
27 punitive damages.

28

1 **SECOND CAUSE OF ACTION**

2 **Section 504 of the Rehabilitation Act**

3 48. Ms. Watson re-alleges and incorporates herein all previously alleged paragraphs  
4 of the Complaint.

5 49. Ms. Watson is “an individual who has a physical or mental impairment which  
6 substantially limits one or more of such person’s major life activities,” and thus a  
7 qualified individual with a disability within the meaning of Section 504. 29 U.S.C.  
8 § 705(20)(B) and 29 U.S.C. § 12102.

9 50. Section 504 provides that “no otherwise qualified individual with a disability in  
10 the United States ... shall, solely by reason of his or her disability, be excluded  
11 from the participation in, be denied the benefits of, or be subjected to  
12 discrimination under any program or activity receiving federal financial  
13 assistance.” 29 U.S.C. § 794(a).

14 51. Defendant LAC-DMH has received federal financial assistance at all relevant  
15 times, including from the Department of Health and Human Services (“HHS”).  
16 Section 504 requires the head of every executive agency to promulgate  
17 regulations necessary to carry out the Acts. 29 U.S.C. § 794(a). HHS regulations  
18 provide that “[n]o qualified person with a disability shall, on the basis of disability,  
19 be excluded from participation in, be denied the benefits of, or otherwise be  
20 subjected to discrimination under any program or activity which receives Federal  
21 financial assistance.” 45 C.F.R. § 84.4(a).

22 52. Defendant LAC-DMH has violated the rights of Ms. Watson under Section  
23 504(a) and its implementing regulations through policies, actions, or inactions  
24 with respect to the right to equal participation in programs and activities that it  
25 offers that require use of IBHIS. Ms. Watson has suffered harm, as a result of  
26 Defendant’s discrimination against her on the basis of her disability.

27 53. Section 504 provides that “[t]he remedies, procedures, and rights set forth in title  
28 VI of the Civil Rights Act of 1964 ... shall be available to any person aggrieved by

1 any act or failure to act by any recipient of Federal assistance....” 29 U.S.C. §  
2 794a(a)(2). Ms. Watson is aggrieved by Defendant LAC-DMH’s act or failure to  
3 act, which causes her professional harm, humiliation, indignity, and emotional  
4 distress.

5 54. Section 504 allows for compensatory damages upon a showing that Defendant’s  
6 conduct was intentional or deliberately indifferent.

7 55. Ms. Watson’s need for accommodation is obvious, access requirements for  
8 electronic or information technology are well established by federal and state law  
9 and regulation, and Ms. Watson repeatedly notified Defendant LAC-DMH that  
10 she did not have equal access to activities requiring IBHIS, Defendant’s  
11 inaccessible electronic or information technology system. Defendant’s policies  
12 and conduct toward Ms. Watson in failing to make IBHIS accessible and/or  
13 provide her a qualified reader are either intentional or deliberately indifferent.

14 56. Defendant LAC-DMH’s conduct constitutes an ongoing and continuous violation  
15 of Section 504 with respect to Ms. Watson, which causes her harm for which  
16 there is no adequate remedy at law. Ms. Watson will continue to be denied the  
17 benefits of, and be subjected to discrimination, because of Defendant’s policies,  
18 actions, and inaction that excludes her from equal participation in its program  
19 activities that require use of IBHIS.

20 57. Consequently, Ms. Watson is entitled to injunctive relief and compensatory  
21 damages as well as reasonable attorneys’ fees and costs.

22 **THIRD CAUSE OF ACTION**

23 **Cal. Gov’t Code § 12940(a)**

24 58. Plaintiff re-alleges and incorporates herein all previously alleged paragraphs of  
25 the complaint.

26 59. Ms. Watson is legally blind and as such is recognized as a person with a disability  
27 under California Government Code section 12926.

28 60. LAC-DMH and Dr. Sherin are each an “employer” and a “person” under

- 1 California Government Code sections 12925 and 12926.
- 2 61. By forcing employees to rely on an inaccessible electronic and information  
3 technology system, Defendants have created an artificial job requirement of sight  
4 that has a disparate impact on blind employees in violation of the California Fair  
5 Employment and Housing Act (“FEHA”), Cal. Gov’t Code § 12940(a).
- 6 62. By failing to remediate the access barriers in IBHIS, Defendants have failed to  
7 reasonably accommodate Ms. Watson in violation of FEHA.
- 8 63. By denying Ms. Watson, on the basis of her disability, access to the benefits and  
9 privileges of employment provided through the full use of the IBHIS system,  
10 Defendants have violated FEHA.
- 11 64. By failing to conduct a proper accommodation analysis or participate in good  
12 faith in the required interactive process, Defendants have violated FEHA.
- 13 65. Defendants have created a realistic threat of looming poor performance reviews,  
14 limiting Ms. Watson’s future employment opportunities because of her disability,  
15 in violation of FEHA.
- 16 66. Defendants’ conduct constitutes an ongoing and continuous violation of FEHA  
17 with respect to Ms. Watson, which causes her harm for which there is no  
18 adequate remedy at law. Ms. Watson will continue to be denied the benefits of,  
19 and be subjected to discrimination, because of Defendants’ policies, actions, and  
20 inaction.
- 21 67. Defendants have acted with malice or reckless indifference to Ms. Watson’s  
22 rights.
- 23 68. Ms. Watson is therefore entitled to injunctive relief, compensatory damages for  
24 pain and suffering, and punitive damages.

25 **FOURTH CAUSE OF ACTION**

26 **(Declaratory Relief)**

- 27 69. Ms. Watson re-alleges and incorporates herein all previously alleged paragraphs  
28 of the complaint.

1 70. Ms. Watson contends that IBHIS is inaccessible in violation of federal and state  
2 law. Defendants disagree with her contention.

3 71. Until IBHIS is made independently accessible for assistive technology such as  
4 screen readers, Ms. Watson contends that she is entitled to a qualified reader, a  
5 person able to read effectively, accurately, and impartially using any necessary  
6 specialized vocabulary, available throughout her work day without delay because  
7 his or her sole or prioritized task is to act as an aide to Ms. Watson, as a  
8 reasonable accommodation and to provide effective communication of  
9 information provided through IBHIS. Defendants disagree with Ms. Watson's  
10 contention.

11 72. A judicial declaration is necessary and appropriate at this time in order that each  
12 of the parties may know their respective rights and duties and act accordingly.  
13

14 WHEREFORE, Ms. Watson requests relief as set forth below.

15 **RELIEF REQUESTED**

16 Ms. Watson prays for judgment as follows:

- 17 a) A declaration that IBHIS is inaccessible in violation of federal and state law;  
18 b) A declaration that Ms. Watson is entitled to a qualified reader, a person able  
19 to read effectively, accurately, and impartially using any necessary specialized  
20 vocabulary, available throughout her work day without delay because his or  
21 her sole or prioritized task is to act as an aide to Ms. Watson, and that  
22 Defendants' refusal to provide this reasonable modification and auxiliary aide  
23 for effective communication discriminates against Ms. Watson on the basis of  
24 her disability in violation of federal and state law;  
25 c) A preliminary and permanent order enjoining Defendants from violating  
26 disability discrimination laws in its refusal to make IBHIS independently  
27 accessible or provide Ms. Watson a qualified reader to assist during work;  
28 d) Compensatory and punitive damages against Defendants, jointly and severally,

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- for harms suffered by Plaintiff as a result of violations of Title I of the ADA;
- e) Compensatory damages against Defendant LAC-DMH for harms suffered by Plaintiff as a result of violations of Section 504;
- f) Compensatory and punitive damages against Defendants, jointly and severally for harms suffered by Plaintiff as a result of violations of the California FEHA;
- g) An award of Plaintiff’s reasonable attorneys’ fees and costs against Defendants, jointly and severally; and
- h) Such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and Local Rule 38-1, Plaintiff respectfully requests a jury trial on all issues triable thereby.

DATED: May 13, 2019

Respectfully submitted,

TRE LEGAL PRACTICE

/s/ Timothy Elder

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Timothy Elder  
Attorneys for Plaintiffs